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January 10, 2023

The Honorable Catherine C. Blake
United States District Judge
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: Grimaldi Deepsea SpA v. Busillo, et al.
Civil Action No. 1:22-cv-01343-CCB

Dear Judge Blake:

This letter follows up on the status report provided to the Court by former counsel for Plaintiff, Charles L. Simmons Jr., on November 18, 2022 (ECF 23) and our letter to the Court on December 19, 2022.

I and this firm have now entered our appearances in this action, and the Court has approved the withdrawal of prior counsel for Plaintiff. Considering the delay caused by the change of counsel and the time involved in new counsel for Plaintiff becoming familiar with the file, the parties hereby jointly request an extension of the schedule proposed in counsels' status report of November 18 as follows:

April 24, 2023:	Motion for joinder of additional parties and amendment of pleadings
August 4, 2023:	Plaintiff's Rule 26(a)(2) disclosures
September 5, 2023:	Defendants' Rule 26(a)(2) disclosures
September 19, 2023:	Plaintiff's rebuttal Rule 26(a)(2) disclosures
September 26, 2023:	Rule 26(a)(2) supplementation of disclosures and responses
October 24, 2023:	Fact discovery deadline; submission of status report



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October 31, 2023: Requests for Admissions

November 26, 2023: Dispositive pretrial motions deadline

With respect to any potential settlement conference, the parties agree that this should occur following the completion of discovery.

With respect to expert discovery, the parties agree that expert discovery should be completed after dispositive pretrial motions are resolved.

Please let us know if you have any questions.

Very truly yours,

/s/ James W. Bartlett, III

James W. Bartlett, III

JWB/mm

Cc: Alexander M. Giles, Esq. (via ECF)

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